

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

<p>GENOVA BURNS LLC Angelo J. Genova, Esq. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Matthew I.W. Baker, Esq. agenova@genovaburns.com dstolz@genovaburns.com dclarke@genovaburns.com mbaker@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p>BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael Winograd, Esq. Jeffrey L. Jonas, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com jjonas@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Sunni P. Beville, Esq. sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p>BAILEY GLASSER LLP Brian A. Glasser, Esq. Thomas B. Bennett, Esq. bglasser@baileyglasser.com tbennett@baileyglasser.com 105 Thomas Jefferson St. NW, Suite 540 Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>	<p>OTTERBOURG P.C. Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. mcyganowski@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>

<p>PARKINS LEE & RUBIO LLP Leonard M. Parkins, Esq. Charles M. Rubio, Esq. lparkins@parkinslee.com crubio@parkinslee.com Pennzoil Place 700 Milan St., Suite 1300 Houston, TX 77002 Tel: (713) 715-1666 <i>Proposed Special Counsel to the Official Committee of Talc Claimants</i></p>	<p>MASSEY & GAIL LLP Jonathan S. Massey, Esq. jmassey@masseygail.com 100 Main Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>
<p>In re:</p> <p>LTL MANAGEMENT, LLC,</p> <p>Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 21-30589(MBK)</p> <p>Honorable Michael B. Kaplan</p>
<p>LTL MANAGEMENT LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 21-03032 (MBK)</p>

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS'
MOTION FOR WITHDRAWAL OF THE REFERENCE
OF ADVERSARY PROCEEDING NO. 21-03032 (MBK)**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants (the “Committee”) appointed in the above-referenced chapter 11 case (the “Case”), and party to the above referenced adversary proceeding, Adv. Pro. No. 21-03032 (MBK) (the “Adversary Proceeding”) by virtue of the so ordered stipulation entered November 24, 2021 [Adv. Pro. Dkt. No. 109], by and through their proposed undersigned counsel, hereby respectfully moves the United States District Court for the District of New Jersey (the “Court”) for entry of an order withdrawing the Adversary Proceeding to the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), pursuant to 28 U.S.C. § 157(d), Fed. R. Bankr. P. 5011, and D.N.J. LBR 5011-1 (the “Motion”); and

PLEASE TAKE FURTHER NOTICE that the Motion is being filed pursuant to D.N.J. LBR 5011-1, which provides that “[a] motion for withdrawal of the reference . . . shall be filed in the bankruptcy court,” but that “[a]ll such motions are then to be immediately transmitted to the district court”; and

PLEASE TAKE FURTHER NOTICE that the Motion will be returnable before the Court on December 20, 2021; and

PLEASE TAKE FURTHER NOTICE that the Committee hereby requests oral argument if the Motion is opposed.

Respectfully submitted,

Dated: November 24, 2021

By: /s/ Daniel M. Stolz

Angelo J. Genova, Esq.
Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Matthew I.W. Baker, Esq.
GENOVA BURNS LLC
110 Allen Road
Suite 304
Basking Ridge, NJ 07920
Tel: 973-467-2700
Fax: 973-467-8126
Email: agenova@genovaburns.com
dstolz@genovaburns.com
dclarke@genovaburns.com
mbaker@genovaburns.com

*Proposed Co-Counsel for the Official
Committee of Talc Claimants*